

### **Amendments to the Drawings**

The attached Replacement Sheets of Drawings include changes to FIG. 6, FIGS. 8A-8D, FIG. 10B, and FIG. 11A (originally labeled as FIG. 1A).

With respect to FIG. 6, previously implicit outlines for “authentication service” and “payment service” have been made explicit.

With respect to FIGS. 8A-8D, element reference 244 has been removed.

With respect to FIG. 10B, a typographical error wherein element 302 was mistakenly identified as element 304 has been corrected.

FIG. 1A has been relabeled FIG. 11A to correct a typographical error.

Applicant hereby states that the Replacement Sheets of Drawings include no new matter.

Attachment: REPLACEMENT SHEETS OF DRAWINGS

### **Remarks**

Reconsideration of the issues raised in the Office Action dated May 29, 2009 is respectfully requested in light of the amendments to the specification and the claims, and the remarks presented herewith. The issues are addressed below in the order in which they are presented in the Office Action.

### **Drawings**

In item 1 of the Detailed Action, the drawings have been objected to because "outlines for 'authentication service' and 'payment service' are not present, and hence it is not clear whether items 102, 104, and 16 pertain to the same component items are to different component items."

In the Amendments to the Drawings presented herewith, FIG. 6 has been amended to make explicit such outlines for "authentication service" and "payment service" to clarify that items 102 and 104 are different elements within a network 16.

Also in item 1 of the Detailed Action, it is stated that "FIG. 1A should be relabeled as - FIG. 11A -."

The identification of the typographical error with respect to FIG. 11A is noted with appreciation. In the Amendments to the Drawings presented herewith, the label of original FIG. 1A has been corrected to properly identify the figure as FIG. 11A.

Accordingly, withdrawal of the objections to the drawings identified in item 1 of the Detailed Action is respectfully requested.

In item 2 of the Detailed Action, the drawings are objected to as "failing to comply with 37 CFR 1.84(p)(5) because they include the following reference character(s) not mentioned in the description: 244 in FIG. 8A-8D (item 244 is only mentioned later as it pertains to FIG. 11B-11C)." This objection is respectfully traversed.

In the figures, like elements are generally designated with the same reference number. Thus, it is respectfully submitted that the reference to "loop connector 244" with respect to FIG. 11B-11C also describes the like element in FIG. 8A-8D.

Nevertheless, in an effort to advance prosecution of this matter, in the Amendments to the Drawings presented herewith, the reference to element 244 in FIGS. 8A-8D has been removed.

Accordingly, withdrawal of the objection to the drawings identified in item 2 of the Detailed Action is respectfully requested.

In item 3 of the Detailed Action, the drawings are objected to as "failing to comply with 37 CFR 1.84(p)(4) because reference characters "302" and "304" have both been used to designate a "mark" as shown in FIG. 10B and 10D."

The identification of the typographical error with respect to reference character 302 in FIG. 10B is noted with appreciation. In the Amendments to the Drawings presented herewith, the typographical error has been corrected wherein element 302 was mistakenly identified as element 304 in FIG. 10B. This correction is supported by the corresponding description of FIGS. 10B and 10D, as well as the correct reference to the element in FIG. 10D.

Accordingly, withdrawal of the objection to the drawings identified in item 3 of the Detailed Action is respectfully requested.

### **Specification**

In item 4 of the Detailed Action, the title has been objected to as being "not descriptive."

In the amendments to the Specification presented herewith, a new title is presented that corresponds to the suggestion presented in the Detailed Action.

Accordingly, withdrawal of the objection to the title identified in item 4 of the Detailed Action is respectfully requested.

In item 5 of the Detailed Action, the disclosure has been objected to because of several informalities, including the lack of section headings. The Applicant notes with appreciation suggestions in the Detailed Action for overcoming the objections.

In the amendments to the Specification presented herewith, section headings have been added to the disclosure, and amendments have been made to the specification corresponding to each of the issues and suggestions presented in the Detailed Action.

Additionally, several other amendments have been made to the disclosure to address issues with the usage of certain trademarks as well as to conform certain words to spellings that are of more common form in the United States.

Accordingly, withdrawal of the objections to the specification identified in item 5 of the Detailed Action is respectfully requested.

### **Claim Objections**

In item 6 of the Detailed Action, claims 6-7 and 18-42 have been "objected to under 37 CFR 1.75(c) as being in improper form because a multiple dependent claim cannot itself be dependent on another multiple dependent claim."

It is respectfully submitted that claims 5-7 and 16-42 were amended in a Preliminary Amendment properly submitted with the Application, and that the Preliminary Amendment removed the multiple dependencies from such claims.

Accordingly, withdrawal of the objection to the claims identified in item 6 of the Detailed Action and examination of the claims presented in the Preliminary Amendment, including new claims 43-66, are respectfully requested.

In item 7 of the Detailed Action, claims 1, 11, 21, 23 and 32 were objected to because of certain informalities. The Applicant notes with appreciation suggestions in the Detailed Action for overcoming the objections.

In the amendments to the Claims presented herewith, amendments have been made to the claims corresponding to each of the issues and suggestions presented in the Detailed Action. Additionally, several other amendments have been made to claims corresponding to the objections noted above, as well as several other informalities that were noted by the Applicant in reviewing the claims.

Accordingly, withdrawal of the objection to the claims identified in item 7 of the Detailed Action is respectfully requested.

### **Claim Rejections – 35 U.S.C. 112**

Claims 1 – 42 have been rejected under 35 U.S.C. 112, second paragraph, as being indefinite with respect to the limitation of claims 1 and 8, "*the authentication of a transaction*" on lines 3-4, of which there is no antecedent basis for in the claim."

The Examiner's suggestion that the word "*the*" that is before "*authentication*" in claim 1 be removed is noted with appreciation.

In the amendments to the Claims presented herewith, amendments have been made to claims 1 and 8 corresponding to suggestions presented in the Detailed Action.

Accordingly, withdrawal of the rejection of claims 1-42 under 35 U.S.C. 112, second paragraph, is respectfully requested.

### **Claim Rejections – 35 U.S.C. 102**

Claims 1-2, 7-8, 16-18, 21, and 23-42 have been rejected under 35 U.S.C. 102(b) as being anticipated by Dosch (Publication Number US 200210069364 A1) (“Dosch”). This rejection is respectfully traversed.

Independent claim 1, as amended, recites a device for connection to a data processing apparatus, the device including, *inter alia*: first coupling means for operative coupling to authentication storage means storing predetermined information relating to authentication of a transaction with the data processing apparatus; second coupling means for operative coupling to the data processing apparatus, the device when operatively coupled to the data processing apparatus being responsive to an authentication process carried out via a communications link for authenticating the transaction, the authentication process involving use of the predetermined information; security data entry means for obtaining security data independently of the data processing apparatus; and means for storing the security data temporarily.

Independent claim 8, as amended, recites a device for connection to a data processing apparatus, the device including: first coupling means for operative coupling to authentication storage means storing predetermined information relating to authentication of a transaction with the data processing apparatus; and second coupling means for operative coupling to the data processing apparatus, the device when operatively coupled to the data processing apparatus being responsive to an authentication process carried out via a communications link for authenticating the transaction, the authentication process involving use of the predetermined information; and configuration means for selectively rendering the second coupling means available for coupling to the data processing apparatus.

Both amended independent claim 1 and amended independent claim 8 require first coupling means and a second coupling means. Advantageously, the claimed

“device” may be a dongle for insertion into a data apparatus such as a PC or laptop. The “first coupling means” provides an interface to an authentication storage means (e.g., a smart card or SIM) while the “second coupling means” provides a further interface between the device (e.g., the “dongle”) and the data apparatus (e.g., a personal computer (PC)). Examples of first coupling means include smartcard reader interfaces. Examples of second coupling means include USB and PCMCIA interfaces.

#### Claim 1

With respect to claim 1, it is alleged in the Office Action that Dosch discloses “a device for connection to a data processing apparatus, the device including first coupling means for operative coupling to authentication storage means (identification module 15) storing predetermined information relating to the authentication of a transaction with the data processing apparatus (Page 2, Paragraph 0024),” and “second coupling means for operative coupling to the data processing apparatus (through means 14; Page 2, paragraph 0025), the device when operatively coupled to the data processing apparatus being responsive to an authentication process carried out via a communications link for authenticating the transaction, the authentication process involving the use of the predetermined information (Page 2, paragraph 0027).” This contention is respectfully traversed.

Dosch discloses an internet terminal / WebPad 11 (read as a “data processing apparatus”) that receives an identification module 15 (read as an “authentication storage means”) directly in an interface (“means 13 for communication with the identification module”). Considering the passages identified in the Office Action, particularly paragraphs [0023] to [0027], it is clear that Dosch does not relate to a “device” of the type disclosed and recited in amended independent claim 1, as there is no “device” interposed between the identification module 15 (read “authentication storage means”) and the internet terminal / WebPad 11 (read “data processing apparatus”). Dosch does not disclose the “first coupling means” and the “second coupling means” as recited in amended independent claim 1. Accordingly, it is respectfully submitted that Dosch does not anticipate amended independent claim 1 for at least this reason.

Further, amended independent claim 1 also requires security data entry means for obtaining security data independently of the data processing apparatus, and means for storing the security data temporarily.

It is also alleged in the Office Action that Dosch discloses "security data entry means for obtaining security data independently of the data processing apparatus (Page 2, paragraph 0023)," and "means for storing the security data temporarily (Page 2, paragraph 0026)." This contention is also respectfully traversed.

In paragraphs [0023] and [0026], Dosch discloses the internet terminal / WebPad 11 (read "data processing apparatus") that "comprises a touch-sensitive display ...." The only mechanism for obtaining security data is through the display of the internet terminal 11. Thus, it is respectfully submitted that any "security data" in Dosch is not "independently obtained."

Furthermore such "security data" (however obtained) is not stored temporarily on a storage means in a device that connects to the data processing apparatus. The means for storing the security data temporarily, as recited in claim 1, is explicitly a component of the device for connection to a data processing apparatus distinct from the authentication storage means. It is respectfully submitted that Dosch does not disclose "security data" stored temporarily on a storage means in a device that connects to a data processing apparatus" because Dosch discloses storage of data on the identification module 15 (read "authentication storage means").

Accordingly, for the reasons described above, reconsideration and withdrawal of the rejection of claim 1 under 35 U.S.C. 102(b) is respectfully requested.

#### Claim 8

With respect to claim 8, it is alleged in the Office Action that Dosch discloses the "first coupling means" and the "second coupling means," as discussed above, and it is also alleged that Dosch discloses "configuration means for selectively rendering the second coupling means available for coupling to the data processing apparatus (Page 2, paragraph 0025)." These contentions are respectfully traversed.

As discussed above, Dosch does not disclose the "first coupling means" and the "second coupling means" as recited in amended independent claim 1. Since amended

independent claim 8 also recites the “first coupling means” and the “second coupling means,” it is respectfully submitted that Dosch also does not anticipate amended independent claim 8 for at least this reason.

In addition, Dosch lacks a “configuration means for selectively rendering the second coupling means available for coupling to the data processing apparatus,” as recited in amended independent claim 8. As discussed above, Dosch does not actually teach a device that couples with a data processing apparatus, so this feature is *prima facie* absent. Even if, *arguendo*, Dosch was interpreted as disclosing a “device” and a “data processing apparatus,” as recited, it is clear that Dosch does not disclose “configuration means for selectively rendering the second coupling means available for coupling to the data processing apparatus,” either in paragraph [0025] or elsewhere in Dosch.

Accordingly, for the reasons described above, reconsideration and withdrawal of the rejection of claim 8 under 35 U.S.C. 102(b) is respectfully requested.

Claims 2, 7, 16-18, 21, and 23-42

Claims 2, 7, 16-18, 21, and 23-42 depend from one of amended independent claims 1 and 8, and, therefore, are allowable over Dosch for at least the reasons provided in support of the allowability of the claims from which they depend.

**Claim Rejections – 35 U.S.C. 103**

Claims 3-6

Claims 3-6 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Dosch in view of Zhou et al. (U.S. Patent No. 6,559,620 B2) (“Zhou”). This rejection is also respectfully traversed.

Claims 3-6 depend from independent claim 1.

It is respectfully submitted that Zhou does not add anything that would remedy the aforementioned deficiencies of Dosch. Accordingly, it is respectfully submitted that claims 3-6 are allowable over the combination of Dosch and Zhou for at least the reasons provided in support of the allowability of independent claim 1 over Dosch.



Claims 9-15

Claims 9-15 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Dosch in view of Wang (U.S. Patent No. 5,813,421) ("Wang"). This rejection is also respectfully traversed.

Claims 9-15 depend from independent claim 8.

It is respectfully submitted that Wang also does not add anything that would remedy the aforementioned deficiencies of Dosch. Accordingly, it is respectfully submitted that claims 9-15 are allowable over the combination of Dosch and Wang for at least the reasons provided in support of the allowability of independent claim 8 over Dosch.

Claims 19-20, 22, and 37

Claims 19-20, 22, and 37 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Dosch in view of Gregory et al. (U.S. Patent No. 7,26,849 B1) ("Gregory"). This rejection is also respectfully traversed.

Claims 19-20, 22, and 37 depend from independent claim 1.

It is respectfully submitted that Gregory also does not add anything that would remedy the aforementioned deficiencies of Dosch. Accordingly, it is respectfully submitted that claims 19-20, 22, and 37 are allowable over the combination of Dosch and Gregory for at least the reasons provided in support of the allowability of independent claim 1 over Dosch.

**Preliminary Amendment – Claims 43-66**

As discussed above, a Preliminary Amendment was properly submitted with the Application (i.e., simultaneous with filing the application). The Preliminary Amendment removed the multiple dependencies from the claims, and added new claims 43-66. Accordingly, examination of claims 43-66 presented in the Preliminary Amendment is respectfully requested.

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Allowance of the application in its present form is respectfully solicited.

Respectfully submitted,

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